

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JEFFREY LAYDON, on behalf of himself and all  
others similarly situated,

Plaintiff,

- against -

MIZUHO BANK, LTD., THE BANK OF TOKYO-  
MITSUBISHI UFJ, LTD., SUMITOMO MITSUI  
BANKING CORPORATION, RESONA BANK, LTD.,  
MIZUHO CORPORATE BANK, LTD., THE BANK  
OF YOKOHAMA, LTD., MITSUBISHI UFJ TRUST  
AND BANKING CORPORATION, MIZUHO TRUST  
AND BANKING CO., LTD., THE SUMITOMO  
TRUST AND BANKING CO., LTD., CITIBANK,  
JAPAN LTD., JPMORGAN CHASE BANK, NA, THE  
ROYAL BANK OF SCOTLAND GROUP PLC,  
DEUTSCHE BANK AG., UBS AG, BNP PARIBAS  
S.A., SHINKIN CENTRAL BANK, THE SHOKO  
CHUKIN BANK, THE NORINCHUKIN BANK,  
BARCLAYS BANK PLC, HSBC HOLDINGS PLC,  
CITIBANK NA, CRÉDIT AGRICOLE CIB, LLOYDS  
BANKING GROUP PLC, SOCIÉTÉ GÉNÉRALE,  
AND RABOBANK GROUP,

Defendants.

Docket No. 1:12-cv-03419-GBD

[PROPOSED] CIVIL CASE MANAGEMENT PLAN AND SCHEDULING ORDER

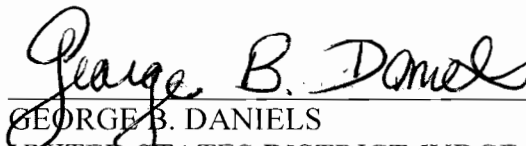
After consultation with counsel for the parties, the following Initial Case Management Plan is adopted.

The Court hereby ORDERS:

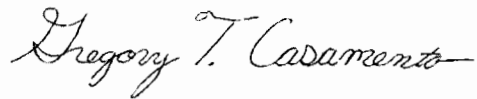
1. Plaintiff, by its counsel, shall use its best efforts to complete service of process pursuant to The Hague Convention on Defendants Mizuho Bank, Ltd., Resona Bank, Ltd., Mizuho Trust and Banking Co., Ltd., and Shoko Chukin Bank (the "Hague Service Defendants"), within 90 to 120 days from the Court's approval of an international process server. Plaintiff shall update the Court and counsel for Defendants on the status of such service of process on or before September 21, 2012.

2. Plaintiff shall have until October 1, 2012, or 7 days from the time service of process is completed over the Hague Service Defendants, whichever is later, to file a First Amended Complaint.
3. A Status Conference is scheduled for Oct. 11 at 9:30 in the event that the First Amended Complaint is not served and filed by October 1, 2012. That Status Conference will consider the additional time the plaintiffs will have to file an amended complaint. In the event that the First Amended Complaint is served and filed by that date, the Status Conference will be taken off calendar.
4. Defendants shall have 60 days from the date Plaintiff filed the First Amended Complaint to move, answer or otherwise respond to the First Amended Complaint;
5. If Defendants move to dismiss the First Amended Complaint, Plaintiff shall respond within 60 days and the Defendants shall reply within 45 days of the Plaintiff's Response.
6. The Court will issue an additional Case Scheduling Order following resolution of the Defendants' motion(s) to dismiss;
7. If a party seeks to pursue discovery prior to the resolution of any motion(s) to dismiss and another party objects to the conduct of such discovery, the Court shall determine at that time whether such discovery should be allowed to proceed; and
8. This case is removed from the Pilot Project Regarding Case Management Techniques for Complex Civil Cases in the Southern District of New York.

SO ORDERED THIS \_\_\_\_\_ day of \_\_\_\_\_, 2012 JUL 27 2012

  
\_\_\_\_\_  
GEORGE B. DANIELS  
UNITED STATES DISTRICT JUDGE  
HON. GEORGE B. DANIELS

LOCKE LORD LLP

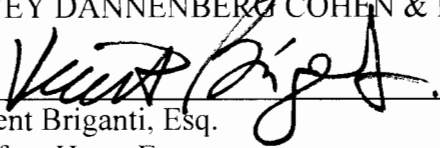
A handwritten signature in black ink that reads "Gregory T. Casamento". The signature is fluid and cursive, with a long horizontal stroke at the end.

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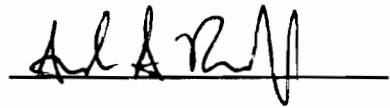
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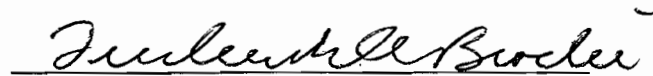
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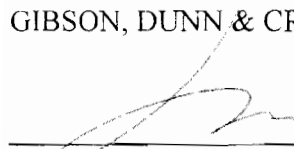
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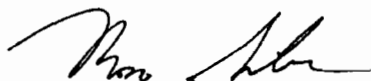
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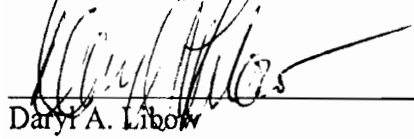


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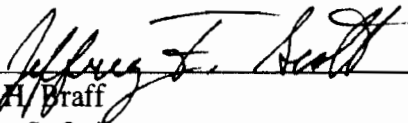
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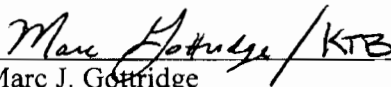
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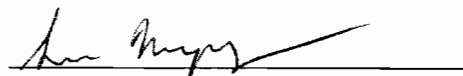
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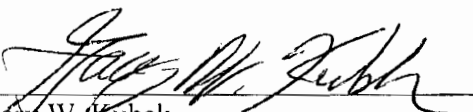
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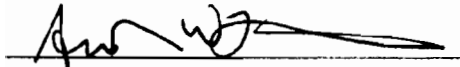
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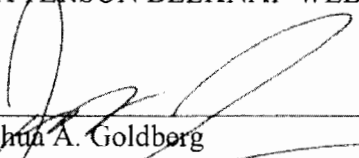
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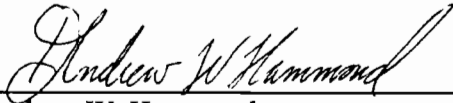
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